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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER

Plaintiff

v.

JOSHUA MOON ET AL.,

Defendants

**PLAINTIFF'S RULE 26(a)(1)
DISCLOSURES**

Case No.: 2:24-cv-00421-DBB-JCB

Plaintiff Russell Greer comes now and submits his Rule 26 disclosures.

1. List of Individuals/Witnesses

There are witnesses who have witnessed the intentional copyright infringement by Kiwi Farms and the detrimental toll it has taken on Plaintiff. Due to the nature of Kiwi Farms' stalking and doxxing reputation, plaintiff does not feel comfortable listing addresses and phone numbers of witnesses PUBLICLY. Plaintiff would provide witnesses upon a stipulation with defendants' counsel that the witnesses would be provided under seal and names not published onto the kiwi farms website. The witness shouldn't be intimidated by the bad actors on kiwi farms.

2. List of Documents, ESI or Tangible Things

There are not any documents in Plaintiff's possession that would need to be provided to Defendants' counsel, aside from just the many harassing messages and examples of copyright infringement done by the nefarious individuals on Kiwi Farms.

3. Computation of Damages

The damages are computed at \$150,000 per willful infringement. Four copyrights have been willfully infringed and so that would be \$600,000 in willful damages. This number could change during discovery.

Respectfully

DATED: December 3, 2024

Russell Greer

/rgreer/

Pro Se

CERTIFICATE OF SERVICE:

Pursuant to FRCP 5(b), I certify that on December 3rd, 2024, I served a true and correct copy of the attached document by ECF to all attorneys on record.